

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

CHIEF HEARING OFFICER DIRECTIVE

DOCKET NOS. 2021-88-E, 89-E, and 90-E ORDER NO. 2021-98-H

JULY 16, 2021

CHIEF HEARING OFFICER: David Butler

DOCKET DESCRIPTIONS:

Dominion Energy South Carolina, Inc.'s 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)

Duke Energy Carolinas, LLC's 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)

Duke Energy Progress, LLC's 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)

MATTER UNDER CONSIDERATION:

Questions from Commissioners for prospective and qualified independent third-party consultants and experts.

CHIEF HEARING OFFICER'S ACTION:

Pursuant to Commission Order No. 2021-488, please find listed below questions from Commissioners for prospective and qualified independent third-party consultants and experts:

Consultant Interview Questions

(Please be advised that the Commissioners may ask additional questions.)

Provide a brief opening statement of who you are, your work background, and your qualifications. Assure the Commission that you are a qualified independent expert.

Questions

- 1) Have you ever appeared before the Public Service Commission of South Carolina as a consultant or representative for a party? If so, which party, where, and what docket?**
- 2) Have you ever been retained as a consultant for Duke Energy Carolinas, Duke Energy Progress, or Dominion Energy or any of their affiliates? If so, when and where and what were the terms and monetary amounts of the contracts?**
- 3) Have your employees, associates, contractors, or partners ever been retained to represent investor owned public utilities in South Carolina. If so, when and where and what were the monetary amounts of the contracts?**

- 4) Do you or members of your immediate family, partners, or associates own stock in Duke Energy Carolinas, Duke Energy Progress, or Dominion Energy. If so, in whose name are the certificates titled and how many shares do they own?
- 5) Do you have any reason to believe that you cannot serve as a fair, impartial, or independent consultant for any of these dockets?
- 6) Do you have any ongoing business dealings with the parties in these dockets? If so, what are they?
- 7) Are you currently in any negotiations to represent any of the parties before a Public Service Commission or Public Utilities Commission? If so, what are they?
- 8) Do you hold any licenses, degrees, designations, or credentials that qualify you as an expert in this field (electric utility matters)? If so, when and where did you earn these credentials?
- 9) Are you a member of any utility-related trade groups or organizations? If so, what are they?
- 10) Can you provide a final written proof of a conflicts check from your firm?
- 11) If you are hired as a consultant, are you willing to abstain from any unauthorized ex parte contact with the parties in these dockets?
- 12) Are you aware of any reason that you or your firm should not serve as an independent expert in these dockets?
- 13) What is your schedule for project completion?
- 14) What are your estimated hours per task and estimated total labor hours?
- 15) What are your estimated total costs?
- 16) Relative to the requirements of Act 62 and relative to avoided costs, what information does the Commission need to receive from your firm?
- 17) Do you or your firm contribute to Political Action Committees? If so, please identify them.
- 18) Is there anyone who currently works for your organization who worked for a public utility or solar company in the past?
- 19) Is there anyone who worked for your organization in the past who currently works for a public utility or solar company?
- 20) Is there anyone associated with your organization who has any affiliation with a public utility or solar company?
- 21) **For Attorneys Only**
 - a) Are you associated with any matters pending before the Public Service Commission of South Carolina now, or have you in the past?
 - b) Where are you licensed to practice law?
 - c) If you are a member of the Bar, are you in good standing with the Bar Association?
 - d) Have you ever appeared before any Public Service Commission or Public Utilities Commission as the attorney of record? If so, when and where?
 - e) Have you ever worked for any Public Service Commission or Public Utilities Commission? If so, when and where?
 - f) Have you ever been disciplined by the State Bar or Courts where you were or are admitted to practice law? If so, provide the circumstances of why you were disciplined and the outcome.

Subject Matter Questions

- 1) Have you ever drafted purchase power agreements? If so, when and where and please explain your experience.
- 2) Have you ever drafted commitment to sell forms? If so, when and where and please explain your experience.
- 3) Please describe your experience with avoided costs and avoided costs methodologies. Please include specific information such as the timeframe and for what purpose.
- 4) Do you have any experience drafting data requests? If so, when and where and please explain your experience.

This completes the Chief Hearing Officer's Directive.